

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

HEATHER WINSLOW BARR

Petitioner/Plaintiff,

vs.

JOSEPH STANLEY PIGOTT

Respondent/Defendant.

Case No. 19-cv-00682-RSM

**DECLARATION OF MATTHEW  
CUNANAN**

I, Matthew Cunanan, declare under penalty of perjury under the laws of the State of Washington that the following is true and correct:

1. I am the attorney for Petitioner. I am competent to testify as to the matters set forth in this declaration and I make this declaration based upon my own personal knowledge, relying upon facts, which I believe to be admissible in evidence.

2. My standard hourly rate charged for services is \$250 per hour. With more than ten years of experience as a practicing attorney in the Seattle area, my standard hourly rate is usual and customary considering my experience and the region in which I practice. Many other attorneys in this city bill at significantly higher hourly rates providing similar representation.

1           3.       I started my litigation career in 2008 as an intern at the local public defenders office  
2 known as Society of Counsel Representing Accused Persons. I received my Juris Doctorate degree  
3 from the Seattle University School of Law in December 2009. I received my license to practice law  
4 from the Washington State Supreme Court in June 2010 and immediately founded DC Law Group.  
5 I am also licensed to practice in the United States Bankruptcy Court for the Western and Eastern  
6 Districts of Washington, the United States District Court for the Western and Eastern Districts of  
7 Washington as well as being admitted pro hac vice into the Los Angeles County Superior Court.

8           4.       I have represented numerous clients in commercial, employment, brain injury and  
9 real estate litigation matters. I have extensive experience dealing with federal and state government  
10 agencies in federal court as well as in administrative proceedings, hearings, and appeals. I have tried  
11 numerous cases to verdict in state and federal court as well as in private arbitrations and trials.

12           5.       I have expended a total of 10 hours and 36 minutes of time working as counsel for  
13 Petitioner in this matter. At my hourly rate of \$250 that amounts to total attorneys' fees to date of  
14 \$2650.00.

15           6.       True and correct copies of invoices from my firm for time expended on this matter,  
16 as billed to the Plaintiff, are attached hereto as **Exhibit 1**.

17           7.       My time expended on this matter is tracked in one tenth of an hour increments, or  
18 six-minute increments. To be clear, each service and/or task was completed by myself.

19           8.       My office has not tracked nor has it invoiced Petitioner for any services provided by  
20 any of our firm's staff, receptionists, legal assistants, paralegals, or other attorneys. This is a notable  
21 reduction and benefit to Petitioner where the standard hourly rates of our legal assistant are and part  
22 time associate is \$125 and \$200.

23           9.       Nothing in the attached exhibit or affidavit shall constitute a waiver of the attorney  
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1 client privilege between the undersigned and Plaintiff. The information in this affidavit is being  
2 provided only as required by the Court rules and/or case law to consider and approve Plaintiff's  
3 request for payment of attorneys' fees and costs. Because it constitutes confidential and sensitive  
4 information, it should not be used in any other context including but not limited to any use in  
5 connection with any other judicial or legal proceeding.

6  
7 SIGNED at Seattle, WA on August 6, 2019.

8 DC LAW GROUP NW

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10 Matthew Cunanan, WSBA #42530  
11 Attorneys for Petitioner  
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# Exhibit 1

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